

**REMARKS**<sup>1</sup>

In the outstanding Office Action, the Examiner rejected claims 1, 4, 9, 12, 17, and 20 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,588,097 to Ono et al. ("Ono") in view of U.S. Patent No. 5,557,714 to Lines et al. ("Lines").

No claims are amended herein. Claims 1, 4, 9, 12, 17, and 20 remain pending in this application.

Applicants respectfully traverse the rejection of claims 1, 4, 9, 12, and 17 under 35 U.S.C. § 103(a) on the ground that a *prima facie* case of obviousness has not been established. A *prima facie* case of obviousness has not been established for at least the reason that Ono and Lines, taken alone or in combination, fail to teach or suggest a three-dimensional object manipulating apparatus including "axis determination means for determining an axis of rotation of the three-dimensional object as a first line through a center of the display screen perpendicular to a second line from the detected coordinate through the center of the display screen," as recited in claim 1.

The Examiner alleges that this feature is disclosed in Ono, stating "the object rotates about the axis O-P0 by rotation angle by specify point P0 and then determining points P2 and P3. Points P2 and P3 determines the second axis of rotation (said **second line**), which is perpendicular to the first axis O-P0 and goes through the center of display." Office Action, page 3 (emphasis in original). Applicants respectfully disagree with the Examiner's characterization of Ono.

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<sup>1</sup> The Office Action contains statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

Ono discloses “a rotation angle  $\alpha$  about the axis (O-P1) after movement is specified by determining points P2 and P3.” Ono, col. 3, lines 58-60. Ono thus discloses that P2 and P3 are used to determine the rotation angle  $\alpha$ , and not a “second axis” as asserted by the Examiner. Moreover, Ono further discloses “. . . rotation about an axis defined by the center O of the spherical surface 22 and the point P0 or P1 . . .” Ono, col. 3, lines 52-53. Ono thus discloses that the axis is determined by the center O and either P1 or P0, but not on the basis of P2 or P3. That is, the axis of rotation of Ono is solely determined by the position of P1 or P0, and has nothing to do with P2 and P3. P2 and P3 are only used in determining the rotation angle  $\alpha$ .

Applicants’ claimed three-dimensional object manipulating apparatus recited in claim 1, on the other hand, “determin[es] an axis of rotation . . . as a first line through a center of the display screen perpendicular to a second line from the detected coordinate through the center of the display screen.” Applicants’ claimed three-dimensional object manipulating apparatus “detect[s] a coordinate,” determines a “line from the detected coordinate through the center of the display screen,” and then determines “a line through a center of the display screen,” which is perpendicular to the “line from the detected coordinate through the center of the display screen.” This perpendicular line is Applicants’ claimed “axis of rotation.”

As discussed above, Ono arbitrarily determines the axis as being a line from the center O to either P0 or P1, regardless of the position of P2, P3, or any other points. The axis of rotation in Ono is not a line which is determined as being a line which is perpendicular to a detected coordinate. The fact that the axis of Ono may be

perpendicular to a detected coordinate P2 or P3, as shown in Fig. 4(c) does not cure this deficiency, as the axis of Ono is not determined from a perpendicular relationship with P2 or P3. Rather, Ono specifically teaches “an axis defined by the center O of the spherical surface 22 and the point P0 or P1.” Ono, col. 3, lines 52-53. Ono thus cannot disclose determining the axis as being a line “perpendicular to a second line from the detected coordinate through the center of the display screen,” as recited in claim 1.

Lines fails to cure the deficiencies of Ono. Lines teaches “[a]ll rotations occur about the center of this sphere, which is the center of the model and also taken to be the origin of the coordinate system for simplicity.” Lines, col. 4, lines 62-65 (emphasis added). Lines thus teaches that the axis of rotation goes through the origin of the coordinate system. Lines, however, provides no teaching or suggestion of a three-dimensional object manipulating apparatus including “determining an axis of rotation of the three-dimensional object as a first line through a center of the display screen perpendicular to a second line from the detected coordinate through the center of the display screen,” as recited in amended claim 1.

For at least the reason that Ono and Lines, taken alone or in combination, fail to teach or suggest each and every element of amended claim 1, a *prima facie* case of obviousness has not been established. Accordingly, Applicants respectfully request that the Examiner withdraw the rejection of claim 1 under 35 U.S.C. § 103(a).

Claims 4, 9, 12, and 17, although of different scope than claim 1, distinguish over Ono and Lines for at least the reasons presented above for claim 1. Applicants therefore request that the Examiner withdraw the rejection of claims 4, 9, 12, and 17 under 35 U.S.C. § 103(a).

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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